

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
Billed Party Preference)
for 0+ InterLATA Calls)

CC Docket No. 92-77

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REPLY COMMENTS OF THE
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Reply Comments in response to the comments filed on August 1, 1994 in the proceeding captioned above. This proceeding is evaluating the merits of adopting a mandate for Billed Party Preference ("BPP") routing to carriers for all 0+ interLATA calls. NTCA is a national association of approximately 500 local exchange carrier ("LECs") providing telecommunications services to subscribers and interexchange carrier ("IXCs") throughout rural and small-town America.

I. THE COMMISSION'S INITIAL COST/BENEFIT ANALYSIS IS FLAWED;
THE PROPER ANALYSIS DOES NOT SUPPORT A BPP MANDATE.

This proceeding centers around one fundamental question: whether society should bear the cost of implementing BPP to get in return, changes in call routing for 0+ calls. The record before the Commission clearly supports a negative response. The proposal to require BPP is based on speculative and overstated estimates of the benefits.¹

¹ See, e.g., Comments of Nynex at 3-8, AT&T at 3-17, BellSouth at 2-18, Iowa Network Services at 13-20, Bell Atlantic at 2-11, American Network Exchange at 4-8, and Competitive Telecommunications Association at 10-13; all filed August 1,

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Second, the initial analysis avoided discussion of the harm that many callers will encounter under BPP. The greatest bulk of calls potentially subject to BPP are made today by travelers and other high volume users. These users are relatively sophisticated in their use of 0+ services. Over the last decade, these users have become proficient in 0+ calling by a variety of means, including the dialing of "10XXX" access codes, special 1-800 access numbers and other arrangements. BPP would remove these less costly caller options (options for which the cost has already been sunk into the network) to be replaced with new calling arrangements (at new cost to the network). From the point of view of the group of callers already accustomed to the current access options, BPP is not needed and not wanted if it must come at a greater cost.² NTCA believes that these callers represent both the majority of users and a far greater majority

¹(...continued)
1994, in this proceeding. Unless otherwise indicated, all citations herein are to comments filed on August 1, 1994, in this proceeding.

² NTCA submits that if BPP were to be mandated then 10XXX, 1-800 and 950 dial around calling from payphones or for other 0+ dialed calls would have to be prohibited, or alternatively, BPP cost recovery charges would have to apply to dialed around calls in addition to BPP applied calls. The current access code dialers would either face having to change their calling arrangement to one based on presubscription or be forced to pay more for 0+ calls with no change in service. GTE suggests that 10XXX and 1-800 dialed around calls should also incur a "query rate charge" even though these callers may not need and may not want to pay for BPP. GTE at 2. Otherwise, the volume of calls using BPP would be minimized by high volume 0+ callers dialing around the BPP arrangement to avoid extra cost and charges, and the providers of BPP would find themselves having to recover the costs of BPP over a smaller number of calls. See Southwestern Bell at 12-13, GTE at 24, and Sprint at 56.

of calls. The highest volume callers would end up paying for BPP, a service they do not necessarily need. Additionally, under BPP, the majority of callers would be forced to seek new, and needless, from their point of view, BPP options.

Finally, the proposal misjudges the extent of cost that society will be asked to shoulder should BPP actually be implemented. A conservative total based on the comments submitted by the LEC industry would place the initial cost outlay at between \$1 and \$2 billion.³ Again conservatively, ongoing annual costs are estimated to be in excess of \$100 million.⁴

Many of the misunderstandings about cost and benefits have been cleared by the comments. These comments demonstrate that the hypothesized cost/benefit analysis that forms the basis for the proposal to mandate BPP is flawed. Indeed, the proper evaluation of benefits and costs as contained in the comments filed on August 1 supports rejection of a BPP mandate.

II. FRUSTRATED CONSUMERS ARE MISTAKEN ABOUT THE VALUE OF BPP RELATIVE TO OTHER APPROACHES.

Despite the changing record that bodes negatively against the merits of BPP, several commenting parties still argue in favor of the calling arrangement. Some of these commenting parties are LECs who disagree with the majority of the LEC

³ See, e.g., Comments of USTA at 4-5, Bell Atlantic at 11-12, and NYNEX at 8.

⁴ Id.

industry in their positive vote for the BPP mandate.⁵ NTCA suspects that these LECs view BPP positively for other business reasons that they do not share with the rest of the LEC community. Perhaps, these LECs see BPP as an economy of scale service that will contribute to their network costs by yielding another net revenue source to their operations.⁶

Leaving aside the business interests of telephone companies, operator services providers, and IXC's, some other parties purporting to represent the interests of the calling public still support BPP, at least in the comment phase of this proceeding. Most notable are the comments of the National Association of State Utility Consumer Advocates ("NASUCA"). NTCA has no reason to doubt the sincere interest of commenting parties like NASUCA in seeking solutions to "discipline the operator services marketplace."⁷ However, NTCA believes that NASUCA and others have been misguided in their analysis by the heretofore flawed cost/benefit analysis and by their overestimation of the extent of reform that BPP may present for the OSP calling marketplace.

NASUCA admits that consumers are most concerned by "excessive prices" and by access code confusion.⁸ NTCA's members, in service to their subscribers, are equally concerned

⁵ See, e.g., Comments of Sprint, Pacific Telesis, GTE, and Southwestern Bell.

⁶ Even these commenting parties express the need to include risk-free cost recovery provisions in the BPP rules.

⁷ NASUCA at 1.

⁸ NASUCA at 1 and 2.

by overcharges and dialing difficulty. We are in agreement with NASUCA as to the problem. We disagree as to the most judicious method to correct the problem at this point in time.

As NTCA stated in its comments, resources should be spent on making sure the current consumer protection provisions associated with 0+ calling are enforced. Instead of spending a great deal of money forcing the LEC segment of the telecommunications industry to implement BPP -- a segment of the industry not responsible for the consumer ills -- the efforts and resources should be concentrated instead on forcing the culprits, the OSPs and payphone owners of the world, to comply with the rules. A sinking boat needs the hole patched not a bigger pump.

It should not go unnoticed that the payphone industry apparently is willing to accept and endorse more rigid regulation of its members including more direct rate regulation.⁹ Furthermore, many commenting parties report that users are more successful than NASUCA believes in their ability to gain access of their preferred carrier.¹⁰ Indeed, the competitive marketplace has fulfilled its promise of consumer choice with the introduction of highly successful 1-800 and other discount priced 0+ calling services options.¹¹ Besides more intense regulation

⁹ See, e.g., Comments of American Network Exchange at 7-8 and Intellicall at 5-7.

¹⁰ See, e.g., SNET at 4, Bell Atlantic at 9, and BellSouth at 3-5.

¹¹ Bell Atlantic notes that MCI, a proponent of BPP, has described its 800-COLLECT service as its "fastest-growing product ever." Bell Atlantic at 9.

of rates, the industry's and regulator's efforts should go to assuring that all payphones and phones in hotels and motels allow access code dialing, that access dialing options are as uniform as practicable, and that sufficient instructions are always available to users.¹²

NTCA understands that NASUCA and the consumers it represents have been frustrated by payphone and hotel 0+ calling practices.¹³ However, this frustration should not lead to support for more costly and less effective solutions. The proper response to these frustrations are to act directly against the problems: unreasonably high rates and lack of convenient access to carriers of choice.¹⁴

III. CONCLUSION

Billed Party Preference as a conceptual approach to equal access for 0+ dialing may have been worthy of consideration at one point in time as a method for consumers to use to reach their choice of long distance carrier in making certain types of calls. However, the time for that consideration passed many years ago, perhaps a decade ago when the equal access design was being

¹² NTCA Comments at p. 7, n. 11.

¹³ NTCA submits that this frustration may cloud users perceived views of the relative value of BPP and other forms of 0+ calling. Frustrated callers are most likely unaware of the additional cost that may be imposed on society with BPP or that the government has other enforcement tools that could be imposed on the 0+ industry.

¹⁴ The Commission's Authority to directly enforce tariff provisions against hotels is well established. United States v. American Tel. & Tel. Co., 57 F.Supp 451 (D.N.Y. 1944), aff'd. 325 U.S. 837 (1944).

formulated. Even when Bell Atlantic first posed the service possibility before the Commission many years ago, the potential benefits, were already diminishing substantially by time and by other changes in the industry. Many more years have now passed, other remedies have been successfully implemented, and the BPP consideration has slipped further into the lost cause category.

Approximately 10 years ago, the industry made a decision to proceed down the route of presubscription. Equipment and software vendors developed the necessary applications, the LEC industry designed its network, and equal access was gradually introduced. To retrofit part of the industry now with an alternate approach to presubscription for 0+ calls and to newly equip other portions of the network would be very costly and imprudent. The record is clear on this point.


Under the originally adopted presubscription plan over the last ten years, callers admittedly have encountered difficulty when making calls that use non-traditional operator services providers. These problems involved unreasonably high rates and the inability to reach callers' operator services provider or IXC of choice. However, again, these problems were seriously confronted in recent years, and substantive legislative and regulatory steps have been taken to correct these problems. Even the non-traditional operator services providers' industry embraces these corrective measures and suggests that these measures should be further strengthened. BPP would abandon these measures in favor of a new, untried, too late approach. The

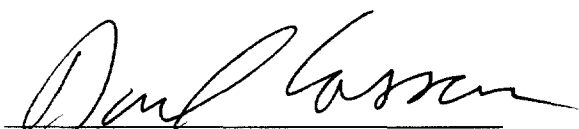
perceived attractiveness of BPP is illusory and fleeting.
Instead, the advisable approach would be to improve the existing measures.

NTCA's comments, the record established in this proceeding, and the reasons cited above support the conclusion that the Commission should not require deployment of Billed Party Preference. Instead, the Commission should seek more cost effective ways to protect captive consumers.

Respectfully submitted,

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1655 West Street
Redding, CA 96001

Commissioner Patricia R. Tappan
Department of Correction Onondaga
County
P.O. Box 143
Jamesville, NY 13078

Mr. Larry A. Fields, Director
Oklahoma Department of Corrections
3400 N. Martin Luther King Avenue
Oklahoma City, Oklahoma 73136

Mr. Don Hass, President
Oklahoma Sheriffs' Association
P.O. Box 1094
Norman, Oklahoma 73070